

JUSTICE FIRST, LLP

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Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,

Plaintiff,

vs.

JASON INGRASSIA, individually and in
his official capacity; COUNTY OF
CONTRA COSTA; and CITY OF
SAN RAMON.

Defendants.

Case No.: Case No. CV07-02669 CRB

**STIPULATION FOR EXPEDITED
MOTION BY PLAINTIFF FOR
PROTECTIVE ORDER PURSUANT
TO FED. R. CIV. PRO. 26(c)**

WHEREAS, Defendant Ingrassia seeks to depose a witness, Richard Ha, prior to the mediation conference presently scheduled for January 11, 2008; and

WHEREAS, the defendant officer intends to be present during the deposition of Richard Ha; and

WHEREAS, Plaintiff and the deponent object to the defendant officer's presence during the deposition of this witness;

IT IS HEREBY STIPULATED AND AGREED between the parties and the undersigned attorneys that:

1. Plaintiff may file a motion for a protective order on an expedited basis, for hearing before the court at 10:30am on December 7, 2007;

2. Plaintiff's motion must be filed no later than Wednesday, November 21, 2007;

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3. Defendant's opposition papers to Plaintiff's motion must be filed no later than Wednesday, November 28, 2007.

4. Plaintiff's reply papers must be filed no later than Tuesday, December 4, 2007.

DATED: November 20, 2007

JUSTICE FIRST, LLP

By: /s/ Jenny Huang
JENNY C. HUANG
Attorneys for Plaintiff
ABHINAV BHATNAGAR

DATED: November 20, 2007

MCNAMARA, DODGE, NEY, BEATTY,
SLATTERY, PFALZER, AND BORGES

By: /s/ James Fitzgerald
JAMES V. FITZGERALD, III
Attorney for Defendant
JASON INGRASSIA

DATED: November 20, 2007

SILVANO B. MARCHESI, County Counsel

By: /s/ Gregory Harvey
GREGORY C. HARVEY
Assistant County Counsel
Attorneys for Defendants
COUNTY OF CONTRA COSTA
and CITY OF SAN RAMON